

EXHIBIT D

Subject: Valsartan, Teva de-designation of documents/deposition confidentiality designations
Date: Tuesday, May 25, 2021 at 8:46:48 AM Eastern Daylight Time
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EXTERNAL TO GT

Victoria,

In light of Judge Vanaskie's order on the motion to seal vis-à-vis ZHP, Plaintiffs request that Teva begin the process of wholesale de-designation of all documents marked as confidential falling within the scope of the Order determining that documents did not warrant confidentiality designation. As stated in the Order, the Court expects the parties to be guided by this Order in order to avoid further unnecessary litigation over this issue.

Please advise as to your proposed plan to do so, in terms of the scope and identity of documents to be de-designated, process to produce replacement documents without the designations or if you have another proposal please advise, and the time frame. Due to the public health implications of the issues in this litigation, Plaintiffs believe it is important for this process to start promptly and to be completed in the near future (meaning not over the course of months).

We also expect that Teva will consider and comply with Judge Vanaskie's order in making confidentiality designations to deposition transcripts. For those depositions where Teva has already served confidentiality designations, we expect that Teva will re-visit and serve updated confidentiality designations that comply with Judge Vanaskie's order.

Thank you for your anticipated attention to this matter.

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